

RCRA Meeting: Solid Waste Management Units (SWMU), Alameda Point

October 13, 2005

9:30 a.m.-11:30 a.m.

Alameda Point, 950 West Mall Square, Building 1, Room 140,

Attendees:

Tommie Jean Damrel	Tetra Tech EM Inc. (Tetra Tech)
Doug DeLong	U.S. Department of the Navy
Glynis Foulk	Tetra Tech
Marcia Liao	Department of Toxic Substances Control (DTSC)
Sue Neishi	Navy
Lou Ocampo	Navy

Attachments:

A — Agenda

B — Solid Waste Management Unit (SWMU) Deferral Approach Diagram [revised as per action items #2 and #3]

C — Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Documents and Non-CERCLA SWMUs [revised as per action item #2]

Lou Ocampo opened the meeting and welcomed all participants. It was noted that Judy Huang from the Regional Water Quality Control Board (Water Board) was unable to attend.

Mr. Ocampo presented the Solid Waste Management Unit (SWMU) Deferral Approach diagram (Attachment B) and CERCLA Documents and Non-CERCLA SWMUs (Attachment C).

Discussion Items:

1. Mr. Ocampo said that the Navy has worked diligently to evaluate all SWMUs at Alameda Point, examining all available documents. He distributed Attachment B to the participants and said that the diagram was attached to a letter dated June 8, 2004, that requested deferral of Resource Conservation and Recovery Act (RCRA) corrective actions on SWMUs to the CERCLA program. The letter was addressed to Mssrs. Sandhu and Landis of DTSC and to Mr. Wolfe of the Water Board. When the letter was sent, the Navy had identified 381 SWMUs by reviewing the RCRA facility assessment (RFA), the environmental baseline survey (EBS), and the CERCLA and total petroleum hydrocarbon (TPH) documents. Although there has been no official response to the letter, Mr. Ocampo said that Navy and Agencies have been working together in a manner consistent with the letter and diagram. He guided the participants through the diagram and said that the SWMU counts may need to be revised.
2. Marcia Liao noted that the Water Board is the lead for TPH issues and reminded the Navy to discuss any applicable screening levels with the Water Board. The Navy acknowledged the Water Board as the lead for these sites and said that the Navy will continue to work with the Water Board and will revise Attachment B accordingly. Ms. Liao said that if the Water Board concurs with no further action (NFA) for a petroleum-related SWMU, then DTSC will also concur.

3. Ms. Liao said that some tanks (listed under the TPH column in Attachment C) should be removed from the petroleum program and assigned to the CERCLA program. The Navy agreed to review and transfer the tanks from the TPH to the CERCLA program, if needed.
4. Ms. Liao asked why there are no site investigations (SI) for the southern portion of Economic Development Conveyance (EDC) Parcel 9. She suggested that SWMU sites that are not petroleum-related be assigned to the CERCLA program and an SI be completed. Mr. Ocampo responded that he prefers to finish the sites under the RCRA program to avoid the lengthy CERCLA process and all of the documentation it requires for closure. Ms. Liao noted that there are no technical requirements for closure under RCRA and so she would have to refer to CERCLA to move forward. Mr. Ocampo said that many sites do not need to progress through the entire CERCLA process and indicated that funding may be an issue. Ms. Liao noted that, ideally, the SWMUs could be closed along with the entire parcel if the sites are addressed in the SI phase of CERCLA. Mr. Ocampo expressed concern about completing an unwarranted grid-like investigation on an entire parcel. Both parties noted that they have the common goal of transferring parcels of land in their entirety. After some discussion of the benefits and disadvantages of each program, it was decided that Mr. Ocampo will relay the conversation to the appropriate Navy personnel and that the SWMUs would move forward as planned for the time being.
5. Glynis Foulk said the Navy will provide the assessment of all of the outstanding SWMUs not yet submitted with previous CERCLA document to the agencies. The goal is to finish the assessment of all the SWMUs and submit to DTSC and the Water Board for review and comments before the contract task order (CTO) expires. After the review and resolution of comments, the Navy would initiate any further corrective actions. Ms. Foulk said that the assessment report for the outstanding SWMUS could be ready to be submitted within a month, and Mr. Ocampo concurred. Ms. Liao pointed out that her workload would not allow her to review of all of the outstanding SWMU information in that time. However, Ms. Liao agreed to review the SWMU assessment in sections, giving priority to SWMUs related to Installation Restoration (IR) sites where a decision document is being prepared.
6. Ms. Liao said that a SWMU is not officially closed until DTSC management reviews, approves, and signs the appropriate documents, even if Ms. Liao sends a letter or comments concurring with NFA. Ms. Foulk asked for advice on the best way to obtain management approval. Ms. Liao replied that she would include transmittal letters with her future comment submittals; the letters will note her review and approval, and will request that DTSC management review her comments during the SI or remedial investigation (RI) phase of the CERCLA process. However, DTSC management may not have time to review every SI and RI, although the proposed plan will be reviewed. Ms. Liao said that she would request that DTSC management approve her comments, concurring with NFA recommendations for the SWMUs in EDC 5.

DTSC management likely will not sign any comments or agreements until the record of decision (ROD) has been prepared. Ms. Liao said that some SWMUs received NFA approval in 1999. However, the remedial project manager signed

the letter without providing information about why NFA was approved. Later, data gaps were identified and the SWMUs had to be reviewed again. Ms. Liao will add a discussion of why a site received NFA to avoid further investigations into future NFA sites. Mr. Ocampo stated it is very unusual that an NFA letter is retracted. Just maybe the letter inadvertently excluded the supporting documentation. This issue may need management's resolution.

Action Items

Item #	Responsible Person	Action	Response
1	Lou Ocampo	Revise the table (Attachment C) to list non-petroleum tanks under the CERCLA program.	Navy needs list from DTSC of specific tanks that are disputed by DTSC.
2	Lou Ocampo	Revise the diagram (Attachment B) and the table (Attachment C) to ensure that the numbers are consistent between the two documents.	Completed; Diagram and table revised 10/26/05 to ensure the numbers are consistent between the two documents.
3	Lou Ocampo	Revise the diagram (Attachment B) to remove DTSC from the second rectangle on the top row.	Completed; Diagram revised 10/26/05
4	Lou Ocampo	Submit to DTSC a document called "Compilation of Outstanding Solid Waste Management Unit Assessment Reports," which will include all outstanding SWMU evaluations, for DTSC review comments and for future reference.	Document will be submitted by November 14, 2005
5	Marcia Liao	Use the compilation of SWMU reports to review SWMU sites, as applicable.	
6	Marcia Liao	Send an e-mail to Mr. Ocampo and copy Glenna Clark (Navy) requesting information for the SWMUs in Site 14.	Complete; Ms. Liao sent an e-mail on October 21, 2005, to Lou Ocampo and Glenna Clark requesting a copy of the SWMU Evaluation Report for Site 14
7	Marcia Liao	Ask DTSC management to review and approve her comments for EDC-5 SWMUs and will note the management review in her transmittal letter.	
8	Marcia Liao	Review the RI attachments with SWMU information for operable unit (OU) 1, OU2A, and OU2B. Ms. Liao has already received the three RI reports.	
9	Lou Ocampo	Relay the discussion of the CERCLA process versus the RCRA process for SWMUs to the appropriate Navy staff.	
10	Lou Ocampo	Continue to coordinate TPH SWMUs with the Water Board and will verify the appropriate screening levels with the board.	Ongoing

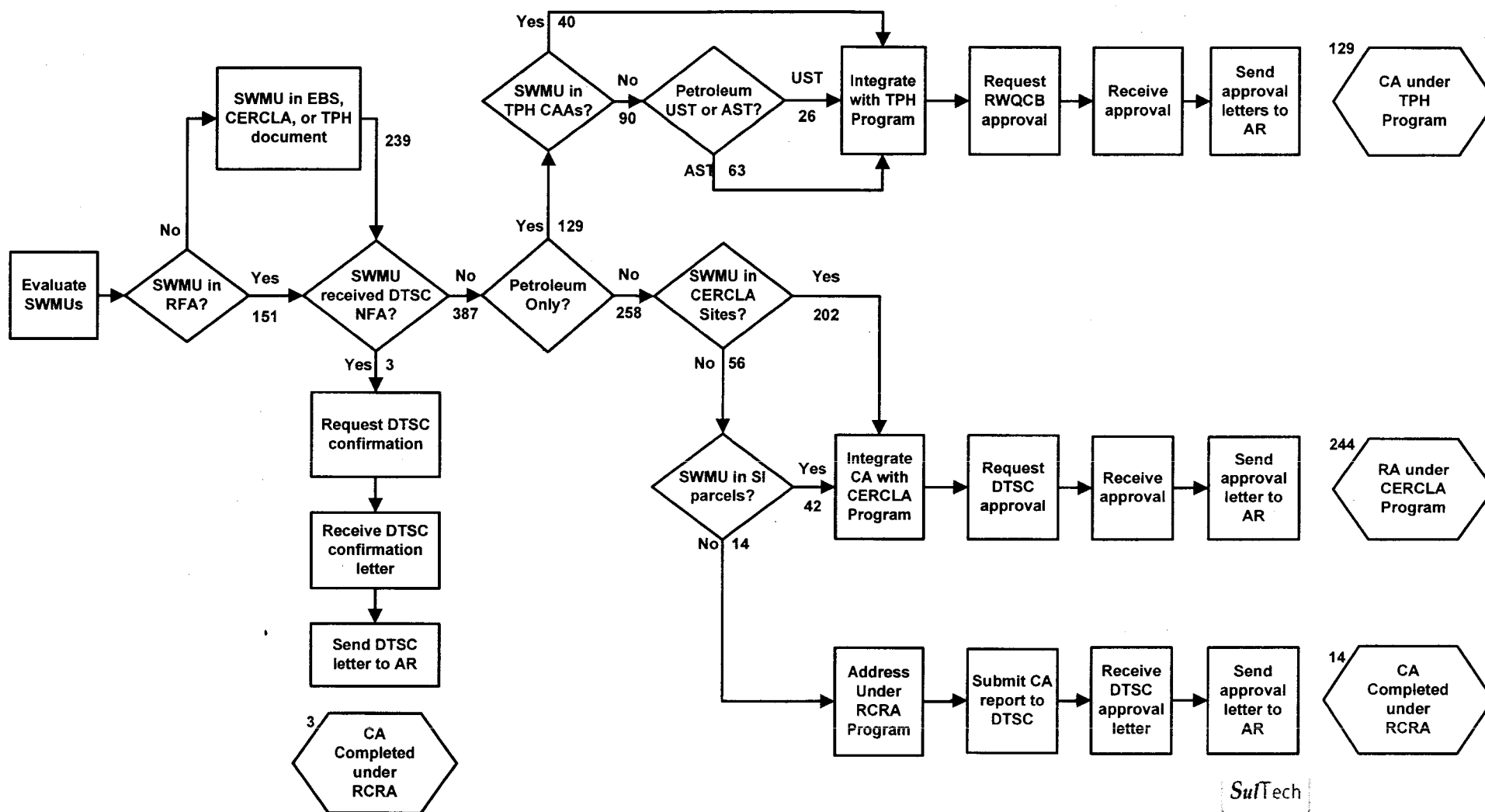
Attachment A

AGENDA
RCRA SWMUs, ALAMEDA POINT, CALIFORNIA

October 13, 2005 at 9:30 am to 11:00 am
Alameda Point, Main Office Bldg #1, Room 140, 950 West Mall Square, Alameda
California

Item	Time	Topic/ Objectives	Lead/Presenter
1	9:30 - 9:35 am	Introduction of participants	Lou Ocampo
2	9:35 - 10:00 am	General discussion on the Status of all SWMUs at Alameda Point	Lou Ocampo, Marcia Liao, Judy Huang
3	10:00 - 10:30 am	Discussion on the Strategy to finish SWMU Assessments and Closures	Lou Ocampo, Marcia Liao, Judy Huang
4	10:30 - 11:00 am	Determination of Action Items	Lou Ocampo, Marcia Liao, Judy Huang

Attachment B



NOTES

1. SWMUs include CERCLA sites, USTs, ASTs, oil-water separators, washdown areas, and underground fuel pipelines but exclude RCRA-regulated units
2. Numbers indicate number of SWMUs

ACRONYMS

AR Administrative Record
 AST Aboveground Storage Tank
 CA Corrective Action
 CAA Corrective Action Area
 CERCLA Comp. Env. Resp., Compensation, and Liability Act
 DTSC Cal EPA Department of Toxic Substances Control
 EBS Environmental Baseline Survey
 NFA No Further Action

RA Response Action
 RCRA Resource Conservation and Recovery Act
 RFA RCRA Facility Assessment
 RWQCB Regional Water Quality Control Board
 SI Site Investigation
 SWMU Solid Waste Management Unit
 TPH Total Petroleum Hydrocarbon
 UST Underground Storage Tank

SuTech

Alameda Point
 Department of the Navy, BRAC PMO West, San Diego, CA

FIGURE A2-2
SOLID WASTE MANAGEMENT UNIT
INTEGRATION APPROACH
RCRA Hazardous Waste Facility Permit
EPA ID CA 2170023236
NAS Alameda, Alameda, CA

Updated October 26, 2005

Attachment C

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Documents and Non-CERCLA SWMUs
Revised October 26, 2005

Site(s)	CERCLA Document	Date ¹	CERCLA SWMUs ²	TPH SWMUs	SWMUs Closed by DSTC	Status	Submittals
EDC-9	None	TBD	14	12		In Progress	To be submitted with Compilation of SWMU Rpt
OU-6 (Site 27)	Draft ROD	2005-08	7	1		In Progress	To be submitted with Compilation of SWMU Rpt
OU-6 (Site 26)	Draft ROD	2005-10	12	2		In Progress	To be submitted with Compilation of SWMU Rpt
OU-4A (Site 2)	Draft RI	2005-11	0	1		In Progress	To be submitted with Compilation of SWMU Rpt
FED-1A	Draft SI	2006-01	3	11		In Progress	To be submitted with Compilation of SWMU Rpt
EDC -17	Draft SI	2006-02	0	1		In Progress	To be submitted with Compilation of SWMU Rpt
OU-1 (Site 14)	Draft ROD	2006-03	3	3		In Progress	To be submitted with Compilation of SWMU Rpt
EDC-12	Draft SI	2006-03	10	9		In Progress	To be submitted with Compilation of SWMU Rpt
Site 32 (New)	Draft RI	2006-04	0	1		In Progress	To be submitted with Compilation of SWMU Rpt
OU-3 (Site 1)	Draft ROD	2006-05	0	3		In Progress	To be submitted with Compilation of SWMU Rpt
Site 34 (New)	Draft RI	2006-12	2	7		In Progress	To be submitted with Compilation of SWMU Rpt
EDC-5	Final SI	Complete	27 (+ 1 removed)	21		Complete	Draft Final submitted with Draft Final SI Feb 05; went final with no changes
OU-1 (Sites 6, 7, 8, 16)	Final RI	Complete	15	3		Complete	Draft submitted with Draft Final RI Sept 05; went final with no changes

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Documents and Non-CERCLA SWMUs
Revised October 26, 2005

Site(s)	CERCLA Document	Date ¹	CERCLA SWMUs ²	TPH SWMUs	SWMUs Closed by DSTC	Status	Submittals
OU-2A (Sites 9, 13, 19, 22, 23)	Final RI	Complete	12	11	1	Complete	Draft submitted with Draft Final RI Mar 2005; went final with no changes
OU-2B (Sites 3, 4, 11, 21)	Draft Final RI	2005-06-30	52	7		Complete	Draft submitted with Draft Final RI May 2005; went final with no changes
PBC-1A	Draft SI	2005-08-01	0	3		Waiting for comments	Submitted Draft 8/1/05
EDC-3	Draft SI	2005-07-07	2	12		Waiting for comments	Submitted Draft 7/7/05
OU-2C (Sites 5, 10, 12)	Draft RI	2005-07-01	64	20	2	Waiting for comments	Submitted Draft 7/1/05
OU-1 (Site 15)		NA	0	0		NA	No SWMUs in Site(s)
OU-4B (Sites 17 & 24)		NA	0	0		NA	No SWMUs in Site(s)
OU-4C (Sites 20 & 29)		NA	0	0		NA	No SWMUs in Site(s)
OU-5 (Site 25)		NA	0	0		NA	No SWMUs in Site(s)
OU-6 (Site 28)		NA	0	0		NA	No SWMUs in Site(s)

Notes:

¹ Dates from August SMP

² Does not include CERCLA Sites

SWMU = Solid Waste Management Unit

CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act

TPH = Total Petroleum Hydrocarbon

Completed

In progress

No SWMUs – no report needed

TRANSMITTAL/DELIVERABLE RECEIPT

Contract No. N68711-03-D-5104

Document Control No. TC . B012 . 12236

TO: Contracting Officer
 Leanora Sili, Code 02RE.LS
 Naval Facilities Engineering Command
 Southwest Division
 1220 Pacific Highway, Bldg 127
 San Diego, CA 92132-5190

DATE: 11/16/05
 CTO: 012
 LOCATION:
 Alameda Point, Alameda, California

FROM: Steven Bradley, Contract Manager

DOCUMENT TITLE AND DATE:

RCRA Meeting: Solid Waste Management Units (SWMU), Meeting Minutes, October 13, 2005

TYPE: ☐ Contractual Deliverable ☐ Technical Deliverable (DS) ☒ Other (TC)

VERSION: Final (e.g., Draft, Draft Final, Final) REVISION #: NA

ADMIN RECORD: Yes ☒ No ☐ CATEGORY: Confidential ☐

SCHEDULED DELIVERY DATE: 11/16/05 ACTUAL DELIVERY DATE: 11/16/05

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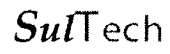
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SulTech:
File/Doc Control
1C/1E (w/QC)
Glynis Foulk
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OTHER:
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1E
Doug DeLong TI CSO
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